

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

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Attorneys for Defendants
World Savings Bank, FSB

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO/OAKLAND DIVISION

LETICIA ZAMORA and DANIEL PEREZ and
ELIZABETH PEREZ,

Plaintiffs,

vs.

WORLD SAVINGS BANK FSB,

Defendant.

No.: C 07 4603 JSW

CLASS ACTION

**DEFENDANT WORLD SAVINGS BANK'S
RESPONSE TO PLAINTIFFS' MOTION
TO ENTER [PROPOSED] PRE-TRIAL
ORDER NO. 1**

Defendant World Savings Bank, FSB ("World") responds to the February 29, 2008 Motion by Plaintiffs Leticia Zamora and Daniel and Elizabeth Perez ("Plaintiffs") to enter their proposed Pre-Trial Order No. 1 as follows:

1. World takes no position with respect to Plaintiffs' application for designation appointment of Andrew Friedman of Bonnett Fairbourn Friedman & Balint, P.C. to act on behalf of

1 Plaintiffs and the putative class in this action and all subsequent related and consolidated actions
2 (i.e., as “Lead Interim Class Counsel”) provided, however, that World does intend by this statement
3 to waive any argument(s) that certification of any class in this action is not appropriate, and in fact it
4 is World’s position that no class can properly, or should, be certified in this action.
5

6 2. In the event that the Court does designate any “Lead Interim Class Counsel,” World
7 does not oppose the issuance of a Pre-Trial Order, in the form of Plaintiffs’ proposed Pre-Trial Order
8 No. 1, relative to any such appointment.

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10 DATED: March 17, 2008.

11 REED SMITH LLP

12 By /s/
13 Jack R. Nelson
14 Attorneys for Defendant
15 World Savings Bank, FSB
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